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PRODUCED UNDER CONFIDENTIALITY AND PROTECTIVE ORDER***

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN N-	:	HON. ROBERT B. KUGLER
NITROSODIMETHYLAMINE (NDMA)	:	HON. JOEL SCHNEIDER
CONTAMINATION PRODUCTS	:	
LIABILITY LITIGATION	:	MASTER DOCKET NUMBER
	:	Civil No. 1:19-md-02875-RBK-JS
This Document Relates to All Actions	:	

DECLARATION OF CARDINAL HEALTH WITNESS

I, Douglas Redinger, the undersigned, hereby declare as follows:

1. I am a Manager, Regulatory Management at Cardinal Health, Inc., a position I have held for two and a half years. In that capacity, I am responsible for managing Cardinal Health's pharmaceutical recall processes and systems. Prior to this role, I was a Manager, Operational Excellence at Cardinal Health, Inc. for one and a half years. I have personal knowledge based on my experience, employment, and review of corporate records, of the facts set forth below. If called and sworn as a witness, I could and would testify thereto.

2. Plaintiffs seek comprehensive data for all individual sales made by Cardinal Health of Valsartan-containing drugs ("Valsartan" or "VCDs") to named Retail Pharmacy defendants ("Retailers"), from January 1, 2012 to December 30, 2019, including lot numbers of such transactions.

3. As I will explain below, Cardinal Health does not maintain lot number information for its VCD sales to Retailers, and is not able to provide such information.

Purchase Information

4. Cardinal Health enters into Agreements with manufacturers (including certain of the Manufacturer Defendants ("Suppliers" or "Manufacturers")), under which Manufacturers

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agree to provide a variety of pharmaceuticals, listed by National Drug Code (“NDC”) numbers, to Cardinal Health.

5. An NDC number is a unique 10-digit or 11-digit, 3-segment number that acts as a universal product identifier for drugs.

6. Pursuant to Cardinal Health’s Agreements with Manufacturers, Cardinal Health makes individual purchases of pharmaceuticals, including VCDs, from Manufacturer suppliers on an as-needed basis.

7. When Cardinal Health receives purchased VCDs from a Manufacturer, the Manufacturer is required to provide Cardinal Health with Transaction Data (“Transaction Data” or “T3”) containing Transaction Information, Transaction History, and a Transaction Statement.

8. The Transaction Data contains, among other information, the NDC number, expiration date, and lot number applicable to the products that are the subject of that purchase transaction.

9. Cardinal Health is required to retain this Transaction Data from Manufacturers for six years.

10. Before any such product is sold, Cardinal Health assigns a Cardinal Identification Number (“CIN”) to each NDC. Cardinal Health does not correlate the CIN with the lot number of any product.

Sales Information

11. Cardinal Health also enters into Agreements with Retailers, under which Cardinal Health agrees to provide a variety of pharmaceuticals, listed by NDC numbers, to Retailers pursuant to various price calculations and terms.

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12. When the pharmaceuticals sold by Cardinal Health are delivered to Retailers, Cardinal Health transfers certain T3 information to Retailers, including the NDC and CIN numbers for the product.

13. However, under the Drug Supply Chain Security Act ("DSCSA"), Cardinal Health is not required to include lot number, previous transaction date or previous ship date in the transaction data that is passed on to Retailers.

14. Cardinal Health does not in the normal course of business associate Manufacturer lot numbers with product that Cardinal Health sells, and does not have any system or database that tracks lot numbers associated with VCDs sold by Cardinal Health.

15. Because Cardinal Health neither passes on lot numbers to customers, nor tracks lot numbers of VCDs that it has sold, it is not possible for Cardinal Health to identify which lot numbers correspond to product sold to customers, including Retailers.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed June 15th, 2020.



Douglas Redinger